



# Desert Control GDPR and Privacy Policy

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# Desert Control GDPR and Data Privacy Policy

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## INTRODUCTION

This Privacy Policy explains how we collect and use (process) personal data in our business. Desert Control AS, by the CEO, is the data controller for the processing.

### Our contact information is:

Desert Control AS  
Business address: Grenseveien 21, 4313 Sandnes, Norway  
Org.nr.: 919415630  
Email address: post@desertcontrol.com

**We take privacy seriously and have taken steps to ensure that we provide clear information about how we process your data and what rights you have. Contact us if you feel something is unclear or missing.**

## YOUR RIGHTS

Please contact us if you have any questions about or will exercise one of your rights. You are entitled to a response no later than within 30 days. Read more on [the Data Protection Authority's pages](#).

- Access and rectify your own information: You can request a copy of any information we process about you and ask us to correct information that is not correct.
- Deletion or restriction: In some situations, you may ask us to delete and/or restrict the processing of information about yourself, but we cannot delete data we are required to process.
- Object to a processing: If we process information about you on the basis of legitimate interest, you have the right to object to it.
- Data Portability: If we process information about you on the basis of consent or a contract, you may ask us to transfer information about you to you or to another data controller.
- You also have the right to withdraw your consent at any time.
- If you are not satisfied with the processing of your data, you can complain to the Norwegian Data Protection Authority, but we hope you will speak to us first so we can try to resolve the matter for you in a good way.

## WHO WE PROCESS PERSONAL DATA ABOUT

### We process personal data about:

- Customers
- Prospects
- Contact persons with suppliers and partners
- Website visitors
- Jobseekers
- Employees
- Former employees

## HOW WE COLLECT PERSONAL DATA

It is voluntary to provide personal information to us, but in order to carry out a trade, however, we need a lot of information from you. We do not rent, purchase or sell personal data from/to others. We do not use automated decisions or profiling in the processing of your personal data, and we do not process special categories of personal data beyond that of a normal employment relationship.

### **We process personal data when you:**

- purchasing our products/services
- contact us by phone, SMS, our website, email or social media
- sign up for newsletters
- enroll in events under our direction
- responds to a survey
- use our website

## Purpose, legal basis and storage

Pursuant to Article 6(1) of the GDPR, we process personal data on the basis of:

- a) Your consent
- b) An agreement we have entered into
- c) A legal obligation we have
- d) A legitimate interest we believe that we have

As a general rule, personal data shall not be processed and stored longer than necessary in order to fulfil the purpose of processing. To comply with this, we have annual GDPR audits where we formally review and review our privacy work. The purpose is to modify, update and, if necessary, delete personal data.

We retain data for as long as we are required to do so under applicable legal obligations, such as related to accounting, tax or employment laws, and/or other relevant rules and regulations. You may contact us at any time if you would like us to stop processing or delete your personal data, but please note that we cannot delete personal data we are legally obligated to process.

We have procedures to ensure that personal data is deleted from all relevant systems when we no longer have a purpose and/or legal basis for continuing to process them.

## HOW WE PROCESS PERSONAL DATA

Here we describe in detail when and how we process your personal data, for what purposes, on what legal basis and for how long.

### We process personal data when:

#### 1. You communicate with us

When you give us your business card or contact us via the website (contact form, comments box, chat or similar), by email, by phone (call, text message) or social media, we process personal data. Depending on where and how you send us a message, this may be your name, contact information, IP address and other information you choose to send to us. We use a *Customer Relationship Management* (CRM) and customer support system to process personal information about potential and existing customers as well as suppliers and partners.

The purpose is to respond to inquiries from you, for history, and to have documentation in case we receive complaints, complaints or legal claims. The legal basis is f), where the legitimate interests are to be able to respond to inquiries from you, for history, and to have documentation in case we receive complaints, complaints or legal claims. We review, archive and delete inquiries as needed, but not less often than every 3rd year. Accounting material is held for up to five years, according to the rules of the Accounting Act.

#### 2. You buy our products and services

When you purchase products and services from us, we process personal data such as your name, contact information, order and payment information and purchase history.

The purpose is to provide products and services to you after ordering/purchase, to have a history of products and services sold, and otherwise to manage and follow up the customer relationship with you. The legal basis is b) agreement and c) legal obligation pursuing, among other things, the Accounting and Tax Act. Accounting material is held for up to five years, according to the rules of the Accounting Act.

#### 3. Marketing in existing customer relationships

When you become a customer with us, we process personal data as mentioned above. If you have an existing customer relationship with us, we may send you marketing by email and SMS, in accordance with Section 15 of the Marketing Act.

The purpose is to provide good customer service. The legal basis is f), where the legitimate interests are to be able to offer you relevant products and services. The legal basis may also be a), where you have given us your consent. You can opt out of marketing at any time by email and SMS. Information about how to unroll is entered in all emails and SMS we send that are related to marketing. The information will be retained for the duration of the customer relationship until you opt out of or until you object to the processing.

#### 4. You apply for a job or work with us

When you apply for a job with us, we process personal data such as your name, contact information, CV and other information we need to assess your application. The legal basis is b) agreement, and possibly Article 9(2 b) and h) if your application contains special categories of personal data. The information is deleted after a person is selected for the job, unless you have consented to us storing your information longer in case you wish to apply for a job at a later date. In this case, the consent will be renewed annually.

For employees, we process personal data as mentioned above, in addition to information necessary to pay wages and otherwise manage the employment. The legal basis for this is b) agreement, c) legal obligations under applicable employment laws and, if applicable, Article 9(2 b) and h) in particular categories of personal data. As a general rule, information about employees is deleted when the employment ends, unless special reasons (such as a dispute over dismissal or dismissal) make it necessary to keep them longer. Information related to wage management is kept up to five years, according to the rules of the Bookkeeping Act.

#### 5. You sign up for newsletters

We send out newsletters by email with information about new articles, blog posts, offers, analyses, reports, data sheets, checklists and the like. The newsletters occasionally contain information about our products and services. When you subscribe to newsletters, we process personal data such as your name, contact information and IP address.

The purpose is to inform about relevant news and offers, as well as to provide good customer service to potential and existing customers. The legal basis is a) consent. It is voluntary to subscribe to the newsletters and you can withdraw your consent (unsubscribe) at any time by clicking "unsubscribe" at the bottom of one of the emails. Your personal data will then be deleted within 3 years.

The provider we use to send out newsletters has integrated analysis that shows that subscribers open and possibly click on links in the newsletters. This functionality is integrated into the system and cannot be disabled. If you don't want your data to be analyzed in this way, you shouldn't become a subscriber. The data we use to analyze the results of the newsletters and to tailor the content to our subscribers. The legal basis is f), where the legitimate interest is to continuously improve our products and services.

#### 6. You sign up for an event

When you attend events with us, we process personal data such as your name and contact information. For payment events, we also collect order and payment information. The purpose is to be able to offer relevant courses, lectures and workshops or to fulfill the agreement on booked events. The legal basis is a) consent or b) agreement and c) legal obligation pursuing, among other things, the Accounting and Tax Act. We may also use your personal data to send you a request for evaluation of the event you attended and invite you to other similar events. The legal basis is f), where the legitimate interest is to continuously improve our products and services, and offer you good customer follow-up.

The information is retained until you request that it be deleted or no later than 3 years after the event, or, by agreement, up to five years under the rules of the Bookkeeping Act.

#### 7. You're answering a survey

We always inform about the purpose of surveys we conduct and whether they are anonymous or not. We do not share the information with anyone else or use it for purposes other than what we have provided. In the case of anonymous surveys, we do not collect personal data. The legal basis for investigations that are not anonymous is a) consent. The information is kept until you request that it be deleted or no later than up to 3 years after you responded to the survey.

#### 8. You are a supplier or cooperate with us

When you enter into an agreement with us either as a supplier, partner or data processor, we process personal data such as name, contact information and correspondence. The purpose is to be able to enter into an agreement with you and the legal basis is b) agreement. The information is kept up to five years under the rules of the Bookkeeping Act. We process personal data related to general correspondence and communications as described above.

#### 9. You use our website

When you use our website, we process personal data in accordance with our Cookie Statement. The purpose is to manage our website, promote the business and respond to visitor inquiries. The legal basis for cookies that store or process information that falls under Section 2-7b of the Norwegian Ekom Act is consent through a preset in your browser, in line with Nkom's recommendations as described [here](#) (November 2020).

## WITH WHOM WE SHARE PERSONAL DATA

In order to run the business efficiently and securely, we sometimes have to share personal data with parties such as:

- Data processors: providers of various services that process your personal data on our behalf\*
- Professional advisers from industries such as lawyer, finance, accounting, auditing and insurance
- Support for IT and management systems
- Public authorities we are obliged to report to

We require that all of us share your personal data with secure your data in accordance with good information security and according to the requirements of the GDPR. We enter into a data processing agreement with anyone who processes data on our behalf, and non-disclosure agreements as needed.

We use data processors for:

- Email, calendar and digital meetings
- Accounting, accounting and invoicing
- Cloud storage
- Newsletter
- Electronic signing
- Surveys

Due to security, we have not specified these by name, but feel free to contact us if you would like to know more.

## TRANSFER OF PERSONAL DATA OUTSIDE THE EU/EEA

In some cases, your personal data is transferred outside the EU/EEA, for example, where we use suppliers outside the EU/EEA to handle the sending of newsletters, to process customer information, to make available products and services on our website, to enable payment, for security on our website and otherwise in order to operate our business in a safe and efficient manner. The transfer of personal data to outside the EU/EEA is permitted only to countries approved by the European Commission or under the necessary safeguards under the GDPR. For example, these could be the EU's standard contracts.

Due to security, we have not specified these by name. Please feel free to contact us if you would like to know more about which such data processors we use, what kind of necessary warranties apply to such transfer and what additional security measures we have implemented.

## SECURITY

We take information security seriously and we will always do our utmost to safeguard your personal data in the best possible way. Among other things, we use strong passwords, encryption of data, access control, backup and two-factor authentication to secure our data and prevent unauthorized users from seeing, modifying, deleting or in any way affecting the data we hold, including your personal data.

We only use reputable IT and management service providers such as web hosting, website and PC security, virus software, email provider, backup, and more. We only allow others to access and/or process your personal data in accordance with our instructions, and only where it is strictly necessary (e.g. for IT support).

We have established procedures for managing data breaches and we will, in case of deviation, send an aberration notice to the Norwegian Data Protection Authority within 72 hours of the detected breach. If the breach carries a high risk of privacy, we will notify affected data subjects.

## RECORDS RETENTION AND DATA MANAGEMENT WITH THIRD-PARTIES

Desert Control expects its Third Parties that create records that contain information relating to Desert Control operations and administration and/or are subject to legal and regulatory record retention requirements ("Desert Control Records") to retain such Desert Control Records in accordance with all applicable legal and regulatory record retention requirements. All such records should be in compliance with GDPR.

Further Desert Control asks that Third Parties adhere to this policy in all dealings with Desert Control, and to ensure any sub-contractors or other parties the Third Party involves does the same.

## COMMITMENT TO GDPR, DATA PRIVACY AND SECURITY

Desert Control is committed to the standards described in this policy and further refer to our Code of Conduct as well as our Third-Party Code of Conduct where requirements in addition to GDPR compliance is described. We commit to:

- Comply with GDPR and the local and international privacy and data protection laws and regulations, including laws and regulations regarding the cross-border transfer of personal information.
- Maintain appropriate procedures, safeguards and controls to secure and protect the confidentiality and integrity of all personal information received from, or processed on behalf of, Desert Control.

## REPORTING VIOLATIONS

Desert Control asks that any violations are reported to Desert Control's CEO, or the Chairman, or the Board of Directors to whom contact information is found on the Company webpage.

## INQUIRIES AND UPDATES

All inquiries and questions should be addressed to Desert Control's CEO.

Desert Control's Board of Directors may update this GDPR and Data Privacy Policy from time to time.

The Board of Directors  
Desert Control AS  
Sandnes, Norway, 26. March 2021